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18 *Counsel for Defendant Google LLC*

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

21 CHASOM BROWN, WILLIAM BYATT,
22 JEREMY DAVIS, CHRISTOPHER
23 CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Case No. 4:20-cv-03664-YGR-SVK

24 Plaintiffs,

**DECLARATION OF MARIE
HAYRAPETIAN IN SUPPORT OF JOINT
SUBMISSION RE: SEALING PORTIONS
OF ORDER ON REFERRED DISCOVERY
ISSUES RE PRESERVATION PLAN
(DKT. 587)**

25 v.

Judge: Hon. Susan van Keulen, USMJ

26 GOOGLE LLC,

27 Defendant.

28 Case No. 4:20-cv-03664-YGR-SVK

29 DECLARATION OF MARIE HAYRAPETIAN IN SUPPORT OF JOINT SUBMISSION RE: SEALING
PORTIONS OF ORDER ON REFERRED DISCOVERY ISSUES RE PRESERVATION PLAN (DKT. 587)

1 I, Marie Hayrapetian, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
 3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.
 4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
 5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Joint
 7 Submission Re: Sealing Portions of the Order Adopting in Part and Modifying In Part the Special
 8 Master’s Report and Recommendation on Referred Discovery Issues re Preservation Plan (Dkt.
 9 587). In making this request, Google has carefully considered the relevant legal standard and policy
 10 considerations outlined in Civil Local Rule 79-5. Google makes this request with the good faith
 11 belief that certain information sought to be sealed consists of Google’s confidential information and
 12 that public disclosure could cause competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portions of the Order
 14 Adopting in Part and Modifying In Part the Special Master’s Report and Recommendation on
 15 Referred Discovery Issues re Preservation Plan (Dkt. 587) (“Order”).

16 4. The information requested to be sealed contains Google’s non-public, sensitive
 17 confidential and proprietary business information that could affect Google’s competitive standing
 18 and may expose Google to increased security risks if publicly disclosed, including various types of
 19 Google’s internal projects, identifiers, data signals, and logs, and their proprietary functionalities,
 20 which Google maintains as confidential in the ordinary course of its business and is not generally
 21 known to the public or Google’s competitors.

22 5. Such highly confidential information reveals Google’s internal strategy and systems
 23 regarding various important products and nonpublic investigations thereto and falls within the
 24 protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3.

25 6. Public disclosure of such highly confidential information could affect Google’s
 26 competitive standing as competitors may alter their system designs and practices relating to
 27 competing products, time strategic litigation, focus their patent prosecution strategies, or otherwise
 28 unfairly compete with Google. It may also place Google at an increased risk of cybersecurity threats,

1 as third parties may seek to use the information to compromise Google's internal systems and
2 operations.

3 7. On May 31, 2022, the parties conferred on the proposed redactions to the Order.
4 Plaintiffs take no position on sealing Google's proposed redactions.

5 8. For these reasons, Google respectfully requests that the Court order the identified
6 portions of Order to be sealed.

7 I declare under penalty of perjury of the laws of the United States that the foregoing is true
8 and correct. Executed in Los Angeles, California on May 31, 2022.

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10 DATED: May 31, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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13 By /s/ Marie Hayrapetian
14 Marie Hayrapetian
15 Attorney for Defendant

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